

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

YASEEN TRAYNOR, on behalf of himself
and all others similarly situated,

Plaintiff,

v.

AMERICAN GREETINGS CORPORATION,

Defendant.

CASE NO. 1:19-CV-02319-JGK

STIPULATION AND ~~PROPOSED~~
ORDER

IT IS HEREBY STIPULATED AND AGREED, by and between counsel for Plaintiff Yaseen Traynor and counsel for Defendant American Greetings Corporation, as follows:

1. The deadline for Defendant to file an Answer, or alternatively file a letter seeking a pre-motion conference with respect to an anticipated Motion to Dismiss, is May 24, 2019.
2. In exchange for Plaintiff's agreement to the deadline in Paragraph 1, and conditioned upon the Court's approval of same, Defendant hereby stipulates that valid service of process has been effected upon it.
3. This Stipulation is without prejudice to any and all of Defendant's jurisdictional and other defenses, other than invalid service of process.
4. This Stipulation may be executed in counterpart, and facsimile and electronic signatures shall be deemed original for the purposes hereof.

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